

Joyce W. Lindauer
State Bar No. 21555700
Joyce W. Lindauer Attorney, PLLC
1412 Main Street, Suite 500
Dallas, Texas 75202
Telephone: (972) 503-4033
Facsimile: (972) 503-4034
ATTORNEYS FOR WHITESTONE UPTOWN
TOWER, LLC AND
PROPOSED ATTORNEYS FOR ALL OTHER
BELOW-CAPTIONED DEBTORS

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	
	§	
WHITESTONE UPTOWN TOWER, LLC,	§	CASE NO. 23-32832-mvl-11
a/k/a Pillarstone Capital REIT Operating	§	
Partnership,	§	
	§	
WHITESTONE INDUSTRIAL-	§	CASE NO. 24-30653-swe-11
OFFICE, LLC,	§	
	§	
WHITESTONE OFFICES, LLC,	§	CASE NO. 24-30654-mvl-11
	§	
WHITESTONE CP WOODLAND	§	CASE NO. 24-30655-mvl-11
PH 2, LLC,	§	
	§	
PILLARSTONE CAPITAL REIT	§	CASE NO. 24-30656-swe-11
OPERATING PARTNERSHIP, LP,	§	
	§	
Debtors.	§	

DEBTORS' MOTION TO JOINTLY ADMINISTER CASES

NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT 1100 COMMERCE STREET, ROOM 1254, DALLAS, TEXAS 75242 BEFORE CLOSE OF BUSINESS ON MARCH 29, 2024, WHICH IS AT LEAST 21 DAYS FROM THE DATE OF SERVICE HEREOF.

ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE CLERK, AND A COPY SHALL BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH

HEREIN. IF A RESPONSE IS FILED A HEARING MAY BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.

IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.

TO THE HONORABLE UNITED STATES BANKRUPTCY COURT:

COME NOW Whitestone Uptown Tower, LLC, Whitestone Industrial-Office, LLC, Whitestone Offices, LLC, White CP Woodland Ph 2, LLC, and Pillarstone Capital REIT Operating Partnership, LP, the Chapter 11 Debtors in the above-styled and referenced bankruptcy cases filed in the United States Bankruptcy Court for the Northern District of Texas, Dallas Division (the “Debtors”), and file this their Debtors’ Motion to Jointly Administer Cases, and in support thereof would show unto the Court as follows::

1. On December 1, 2023, Whitestone Uptown Tower, LLC filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code, Case No. 23-32832, which is pending before the Honorable Michelle V. Larson.

2. On March 4, 2024, Whitestone Industrial-Office, LLC filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code, Case No. 24-30653, which is pending before the Honorable Scott W. Everett.

3. On March 4, 2024, Whitestone Offices LLC filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code, Case No. 24-30654, which is pending before the Honorable Michelle V. Larson.

4. On March 4, 2024, White CP Woodland Ph 2, LLC filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code, Case No. 24-30655, which is pending before the Honorable Michelle V. Larson.

5. On March 4, 2024, Pillarstone Capital REIT Operating Partnership, LP filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code, Case No. 24-30656, which is pending before the Honorable Scott W. Everett.

6. The Debtors are “affiliates” or “insiders” of one another within the meaning of sections 101(2) and 101(31) of the United States Bankruptcy Code. Joint administration of their estates is appropriate under Fed. R. Bankr P. 1015(b).

7. Consistent with this Court’s Local Bankruptcy Rule 1015-1(a), the Debtors are filing this Motion in each of the above-captioned cases. Also pursuant to LBR 1015-1(a), the Debtors seek determination of this Motion before the Honorable Michelle V. Larson, the Judge presiding over the case of Whitestone Uptown Tower, LLC, the first related case filed in this district.

8. The joint administration of the Debtors’ cases will allow the Court to use a single docket for each case and to combine notices to creditors and other parties-in-interest. The Debtors anticipate that the notices, applications, motions, other pleadings, hearings, and orders in these cases will affect each of the Debtors. With joint administration, the Debtors will save time and money and avoid duplicative and potentially confusing filings, by permitting parties to use a single caption on numerous documents and file most documents in one case, and to file a joint plan of reorganization. In addition, joint administration will ensure that the parties-in-interest in each Debtor’s case will be apprised of the various matters before the Court.

9. This is not a motion for substantive consolidation of the Debtors’ estates. The rights of parties in interest will not be prejudiced by entry of an order directing joint administration of the Debtors’ separate chapter 11 cases. Each creditor and party in interest will maintain its rights

in the particular estate against which it allegedly holds a claim or right. The rights of all creditors will be enhanced by the reduction in costs resulting from joint administration.

10. The Debtors request that the official caption to be used by all parties in all pleadings in the jointly administered cases be as follows:

**IN THE UNITED STATES BANKRUPTCY COURT
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a/k/a Pillarstone Capital REIT Operating	§	
Partnership,	§	
	§	
WHITESTONE INDUSTRIAL-	§	CASE NO. 24-30653-swe-11
OFFICE, LLC,	§	
	§	
WHITESTONE OFFICES, LLC,	§	CASE NO. 24-30654-mvl-11
	§	
WHITESTONE CP WOODLAND	§	CASE NO. 24-30655-mvl-11
PH 2, LLC,	§	
	§	
PILLARSTONE CAPITAL REIT	§	CASE NO. 24-30656-swe-11
OPERATING PARTNERSHIP, LP,	§	
	§	
Debtors.	§	(Jointly Administered Under
		Case No. 23-32832-mvl-11)

11. Counsel for Debtors will file with the Court a consolidated master mailing list (matrix) in the affected cases for future noticing requirements.

WHEREFORE, PREMISES CONSIDERED, the Debtors respectfully request the Court to enter an order in each of the Debtors' cases:

- (i) directing the joint administration of the Debtors' chapter 11 cases for procedural purposes only,
- (ii) approving the caption for jointly administrated cases substantially in the form provided herein, and
- (iii) granting such other and further relief as is just and proper.

Dated: March 8, 2024.

Respectfully submitted,

/s/ Joyce W. Lindauer

Joyce W. Lindauer
State Bar No. 21555700
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ATTORNEYS FOR DEBTOR
WHITESTONE UPTOWN TOWER, LLC
and PROPOSED ATTORNEYS FOR ALL
OTHER ABOVE-CAPTIONED DEBTORS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 8, 2024, a true and correct copy of the foregoing document was served via United States first class mail, postage prepaid, upon the U.S. Trustee and the parties on the attached service list.

/s/ Joyce W. Lindauer

Joyce W. Lindauer

SERVICE LIST

Office of the United States Trustee 1100 Commerce Street, Room 976 Dallas, TX 75242	RSS MSBAM2013-C13-TX WUT, LLC c/o Stephen P. Drobny Jones Walker LLP 201 S. Biscayne Blvd. Suite 3000 Miami, FL 33131	Whitestone REIT Operating Partnership, LP c/o Richards, Layton & Finger, P.A. One Rodney Square 920 N. King Street Wilmington, DE 19801
Costar PO Box 7410099 Chicago, IL 60674-5099	AT&T PO Box 6463 Carol Stream, IL 60197-6463	Comcast PO Box 60533 City of Industry, CA 91716
Newlane Finance PO Box 7358 Philadelphia, PA 19101-7358	Fed Ex PO Box 660481 Dallas, TX 75266	Spectrum VOIP PO Box 733619 Dallas, TX 75373-3619
Equifax Information Services PO Box 71221 Charlotte, NE 28272	Montgomery County Tax Office 400 N. San Jacinto St. Conroe, TX 77301	Southern Montgomery County MUD 25212 Interstate 45 Spring, TX 77386
Albert Ramirez 9904 Hummingbird St. La Porte, TX 77571	Ann Harris Bennett Tax Assessor PO Box 4622 Houston, TX 77210	Spring Branch I.S.D. Tax Assessor-Collector PO Box 19037 Houston, TX 77224
West Park MUD Tax Assessor PO Box 1819 Houston, TX 77251	A&G Electrical Service 24887 Lakeside Dr. Hockley, TX 77448	Republic Services PO Box 78829 Phoenix, AZ 85062
City of Houston – Water PO Box 1560 Houston, TX 77251	West Park MUD PO Box 2569 Spring, TX 77383	FirePro Tech, LLC 6830 N. Eldridge Pkwy, Suite 110 Houston, TX 77041
City of Houston Solid Waste Management Dept. PO Box 1562 Houston, TX 77251	John R. Ames, Tax Assessor 500 Elm St. Dallas, TX 75202	Richardson ISD Tax Office 970 Security Row Richardson, TX 75081
TXU Energy PO Box 650638 Dallas, TX 75265	Allied Universal Security Services PO Box 101034 Pasadena, CA 91189	National Appraisal Partners, LLP 3203 Edloe Street Houston, TX 77027

Ambertun Construction
5920 Chisholm Trail
McKinney, TX 75070

Republic Services
PO Box 78829
Phoenix, AZ 85062

DHC Construction
11040 Timber Rd.
Cleveland, TX 77328

Mayte Molina
620 Esterine Rd.
Dallas, TX 75217

Southwest Engineers
PO Box 2499
Slidell, LA 70459

Waste Connections US, Inc.
PO Box 679859
Dallas, TX 75267

First Choice Coffee Services
1500 Precision, Suite 130
Plano, TX 75074

The Dove Day Recycling Co.
PO Box 166602
Irving, TX 75016

Kings III of America, Inc.
751 Canyon Dr., Suite 100
Coppell, TX 75019

David Piwonka, Tax Assessor
10494 Jones Rd., Suite 106
Houston, TX 77065